



**SNAPPY GUM**  
HERITAGE SERVICES

# Environmental Management System Manual

This document is designed  
to be compliant with

**ISO 14000:2015**

This **EMS Manual** is endorsed as at the  
21 November 2017.

Ryan Hovingh,  
Managing Director.

**Revision History**

<b>Revision Date</b>	<b>Description</b>	<b>Sections Affected</b>	<b>Revised By</b>	<b>Approved By</b>
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**Appendix A** Cross Reference of ISO 14001 Requirements and Sections in the EMS Manual and Environmental Procedures.

**Appendix B** Controlled Document List

## 0.0 Terms and Definitions

<b>Auditor</b>	Person with the competence to conduct an audit
<b>Continual improvement</b>	Recurring process of enhancing the environmental management system in order to achieve improvements in overall environmental performance consistent with the organisation's environmental policy.
<b>Corrective action</b>	Action to eliminate the cause of a detected nonconformity.
<b>Document</b>	Information and its supporting media
<b>Environment</b>	Surroundings in which an organisation operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelation.
<b>Environmental aspect (EA)</b>	Elements of an organisation's activities or products or services that can interact with the environment.
<b>Environmental impact</b>	Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organisation's environmental aspects.
<b>Environmental management system (EMS)</b>	Part of an organisation's management system used to develop and implement its environmental policy and manage its environmental aspects.
<b>Environmental objective</b>	Overall environmental goal, consistent with the environmental policy, that an organisation sets itself to achieve.
<b>Environmental performance</b>	Measurable results of an organisation's management of its environmental aspects.
<b>Environmental policy</b>	Overall intentions and directions of an organisation related to its environmental performance as formally expressed by top management.
<b>Environmental target</b>	Detailed performance requirement applicable to the organisation or parts thereof, that arises from the environmental objectives and that needs to be set and met in order to achieve those objectives.
<b>Hazard</b>	Anything that has the potential to cause injury, harm or damage to people, property or the environment.
<b>Interested party</b>	Person or group concerned with or affected by the environmental performance of an organisation.
<b>Internal audit</b>	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the environmental management system audit criteria set by the organization are fulfilled.
<b>Nonconformity</b>	Non-fulfilment of a requirement.
<b>Organisation</b>	Snappy Gum Heritage Services (SGH)
<b>Preventive action</b>	Action to eliminate the cause of a potential nonconformity.
<b>Prevention of pollution</b>	Use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutants or waste, in order to reduce adverse environmental

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	impacts.
<b>Procedure</b>	Specified way to carry out an activity or a process.
<b>Record</b>	Document stating results achieved or providing evidence of activities performed.
<b>Risk</b>	A combination of the likelihood and consequence of an event occurring.

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## **1.0 General**

### **1.1 Company Profile**

Snappy Gum Heritage Services (SGH) is a private consulting practice which specializes in archaeology and cultural heritage management in Australia. SGH is based in Belmont, WA, undertaking fieldwork throughout Western Australia.

### **1.2 Purpose of this Manual**

This Manual defines the Environmental Management System (EMS) of Snappy Gum Heritage Services' activities and contains:

- a) The Environmental Policy;
- b) Statements of responsibility and authority;
- c) An overview of the company's environmental procedures and controls;
- d) The identification of the resources and training allocated to management, performance of work and verification activities including internal audit;
- e) The appointment of the Environmental Management Representative (EMR); and
- f) The arrangement for periodic management reviews.

The purpose of this Manual is to demonstrate that this EMS meets all *ISO 14001:2015* requirements and provide guidance and direction for the implementation and operation of the EMS to all personnel including all relevant documents.

### **1.3 Scope of EMS**

The scope of the EMS applies to the daily everyday functions related to undertaking archaeological heritage surveys and writing reports provided / undertaken by SGH. As part of this EMS, this document focuses on those areas where SGH mostly operates: primarily the Pilbara region, the Goldfields and the South-West.

## 2.0 Policy

### Snappy Gum Heritage Services - Environmental Policy

Snappy Gum Heritage Services (SGH) recognises that its activities as a heritage consultancy interacts with and impacts upon the environment and that it has a responsibility to minimise this impact whenever it has the opportunity to do so, as per the ISO 14001 standard.

To this end, SGH is committed to being a responsible corporate citizen and will comply with all relevant legislation and regulations. SGH intends to incorporate sustainable environmental practices into all aspects of its operations and aims to continually improve its environmental performance.

To achieve this aim, SGH will:

- recognise its obligations, including legislative requirements, both locally and globally;
- establish policies and procedures that promote sustainability, including ecologically sustainable development and practice in planning and operational activities;
- set environmental objectives and targets on a project to project basis to mitigate against the impact on the environment;
- promote environmental awareness and responsibility among all company staff, sub-consultants and clients;
- identify, monitor and report on any legal and ethical environmental obligations;
- maintains a reporting system to ensure all hazards and incidents are documented, investigated and addressed;
- use sustainable resources where possible;
- be conservative in its use of energy and water;
- establish policies to promote waste reduction and recycling;
- implement and maintain an environmental management system consistent with ISO 14001:2015; and
- regularly review this policy.

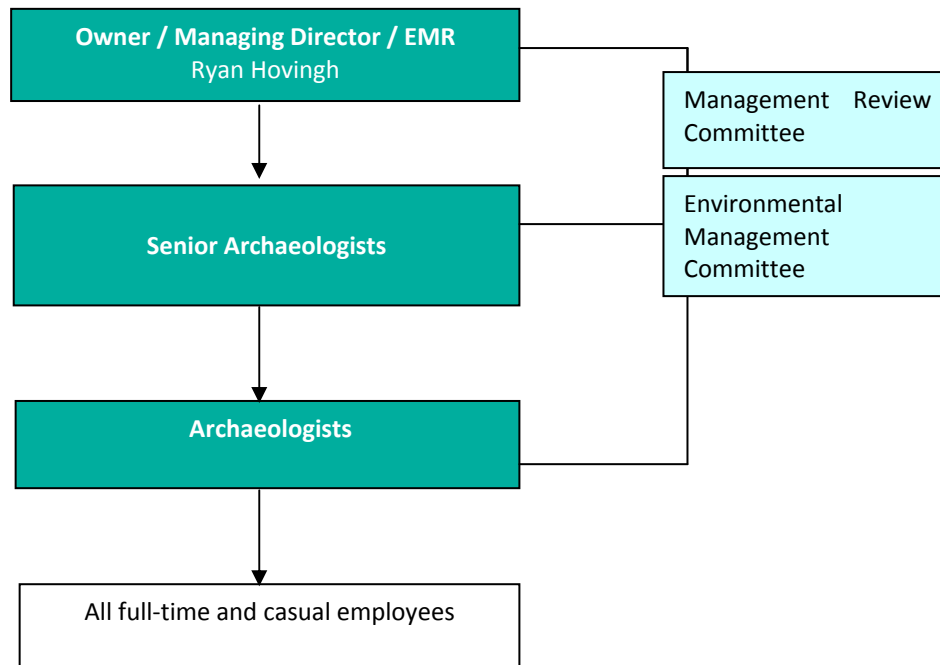
This policy applies to all SGH operations including management, office and fieldwork. The company director, Ryan Hovingh, is responsible for ensuring that the policy is implemented. All employees and sub-consultants will be equally responsible for meeting the aims and objectives of the policy. Progress against these objectives will be monitored through management meetings.

This environmental policy is available to clients, employees and sub-consultants and will be available on our website at [www.snappygumheritage.com.au](http://www.snappygumheritage.com.au)

Authorised Signature	
Authorised by	Ryan Hovingh
Title	General Manager
Date	21 Nov 2017
Review Date	

### 3.0 Organisation

#### 3.1 Organisation Chart



### 3.2 Responsibility

#### 3.2.1 Top Management and Environmental Representative (EMR)

Ryan Hovingh (Owner/Managing Director) is responsible for:

- endorsing the environmental policy;
- ensuring appropriate resource allocation to enable the effective operation and continual improvement of the EMS.

As EMR, Ryan Hovingh has the responsibility and authority for:

- ensuring that EMS requirements are established, implemented and maintained in accordance with the ISO 14001 standard;
- ensuring that sufficient resources are allocated for the proper implementation of the environmental policy and the EMS;
- annually reviewing the policy and the effectiveness of the EMS, and ensuring that the necessary changes are made.

As Managing Director and the EMR, Ryan Hovingh is also the Chairman of the EMS Committee and has the responsibility and authority for:

- leading the EMS Committee to establish and implement the EMS according to ISO 14001 standard, and monitoring the performance of the EMS;
- coordinating internal EMS audits to ensure the EMS has been properly implemented and maintained;
- handling and investigating nonconformity and ensuring corrective and preventive



action has been taken to mitigate any impacts caused;

- d) reporting on the performance of the EMS to the top management for review and as a basis for improvement of the EMS.

The EMR / Managing Director shall organise external safety auditors to undertake the EMS management review annually (at the time of writing in November) to ensure top management commitment and integration of the EMS with business strategies for its implementation and continual improvement.

### **3.2.2 Senior Archaeologists**

All Senior Archaeologists in the field or office environments have the responsibility and authority for:

- a) assisting the EMR to ensure the EMS is effectively implemented and maintained in accordance with ISO 14001 standard;
- b) assuming the responsibility and action of the EMR when the EMR is unavailable.

### **3.2.3 Archaeologists**

All Archaeologists assisting Senior/Principal Archaeologists in the field or in the office and responsible for:

- a) working in accordance with the documented environmental procedures and instructions, specific responsibilities defined in individual procedures and instructions; and
- b) reporting problems or deviations associated with environmental issues and the EMS to the EMS Committee.

### **3.2.4 Environmental Management System Committee (EMS Committee)**

This committee is responsible for:

- a) the establishment and implementation of the EMS;
- b) the establishment and review of objectives, targets, and programmes;
- c) ensuring the effective implementation of environmentally-related operational controls and programmes;
- d) the internal communication of environmental matters between management and employees; and promoting environmental awareness among company staff;
- e) the review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary;
- f) providing leadership in the pursuit of environmental issues;
- g) any other EMS activities that are assigned by the EMR;
- h) holding regular meeting every three months.

### **3.2.5 Management Review Committee**

The Committee systematically examines the EMS to ensure the suitability, adequacy and effectiveness of the EMS. The Committee comprises of the Owner/Managing Director, EMR and designated team leaders.

### 3.2.6 All full-time and casual Employees

All employees are responsible for:

- a) working in accordance with the documented environmental procedures and instructions, specific responsibilities defined in individual procedures and instructions; and
- b) reporting problems or deviations associated with environmental issues and the EMS to the EMS Committee.

## 4.0 Environmental Management System Requirements

The EMS of Snappy Gum Heritage Services is developed to manage significant environmental aspects so as to limit their impacts on the environment. The EMS is established in accordance with ISO 14001:2015, and is described below.

### 4.1 Environmental Management System Documents

The purposes of these EMS documents are as follows:

<b>Environmental Policy</b>	Describes the intention and principles to be adopted in relation to environmental performance, including but not limited to legal compliance, continual improvements and pollution prevention.
<b>Environmental Management System Manual (EMS Manual)</b>	Describes the environmental management system and outlines how the requirements of the International Standard (ISO 14001) are achieved.
<b>Objective(s) *</b>	The overall goals that Snappy Gum Heritage Services set to achieve.
<b>Target(s) *</b>	The set of measurable performance requirements that Snappy Gum Heritage Services establishes to achieve the objectives.
<b>Programme(s) *</b>	The programme and schedule which Snappy Gum Heritage Services implements to achieve the objectives and targets.
<b>Environmental Procedures (EPs)</b>	Define the roles, responsibilities, and actions to be taken to ensure that activities are performed and the EMS implemented in accordance with the environmental policy and the requirements of ISO 14001.
<b>Register of Environmental Aspects / Risk Register</b>	Compiles the environmental aspects that are derived from the activities and services of Snappy Gum Heritage Services. The register also denotes the significance of the environmental aspects and the respective operational controls for significant environmental aspects. <b>This document is combined with the safety register to provide a single document for all staff and contractors to access (SGH SHE Risk Register Combined.pdf).</b>

<b>Register of Legal and Other Requirements</b>	Compiles the legal and other requirements, which include legislation, codes of practice, regulatory and non-regulatory guidelines that are applicable to Snappy Gum Heritage Services.
<b>Environmental Instructions (EIs)</b>	Describe which and how activities should be performed to manage significant environmental aspects and to achieve the EMS ISO 14001 requirements.
<b>Environmental Forms/Records</b>	Record information for the audit trail and the assessment of environmental conditions and performance.

## **4.2 Planning**

Snappy Gum Heritage Services shall follow a “plan-do-check-act” process to facilitate continual environmental performance improvements. The planning process includes the identification and updating of Snappy Gum Heritage Services Risk Register, and the Register of Legal and Other Requirements. Together with Snappy Gum Heritage Services’ environmental policy, objectives and targets are established, and appropriate programmes are formulated to achieve the objectives and targets.

### **4.2.1 Risk Register**

The planning process commences with the identification and updating of environmental aspects. In order to evaluate the impacts of its activities to the environment, Snappy Gum Heritage Services shall consult with the proponent prior to each Scope of Works to identify any environmental issues that must be accounted for during the implementation of the project. These aspects, inclusive of those arising from works carried out by contractors, are registered in the SHE Risk Register, which combines the Safety, Health and Environmental aspects into one document to form on cohesive directive to the Snappy Gum employees.

Snappy Gum Heritage Services shall ensure that all environmental aspects that may pose significant impacts to the environment are under control and prioritised for improvements.

Snappy Gum Heritage Services shall keep this information up-to-date, by reviewing the Risk Register on an annual basis.

### **4.2.2 Legal and Other Requirements**

Snappy Gum Heritage Services shall bi-annually review all relevant legislation and standards that are relevant to the company and relate to the company’s environmental aspects.

Snappy Gum Heritage Services shall identify all relevant legislation, Australian Standards, codes of practice and guidelines that are applicable to the environmental aspects of its activities, products and services, and record this information in the Snappy Gum Legal Register.

Snappy Gum Heritage Services shall keep this information up-to-date by reviewing on an annual basis.

Relevant procedure : [WHS-R-009 Snappy Gum Legal Register](#)

### **4.2.3 Objectives, Targets and Programme(s)**

Based on the environmental policy and significant environmental aspects,

environmental objectives and targets shall be established, implemented and maintained at each function and level within Snappy Gum Heritage Services. Programmes are established, implemented and maintained for achieving its objectives and targets. These targets are consistent with those identified in the Snappy Gum Risk Register, which combines both environmental and workplace hazards and controls.

When establishing and reviewing its objectives, Snappy Gum Heritage Services shall take into consideration the legal and other requirements, significant environmental aspects, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives and targets are consistent with the environmental policy, including commitment to pollution prevention, to compliance with applicable legal requirements and other requirements, and to continual improvement.

The programmes designate the responsibility for achieving objectives and targets at each function and level of the company, together with the means and time frame by which they are to be achieved.

The Owner/Managing Director shall approve the objectives, targets and programmes proposed by the EMS Committee before implementation. The EMR shall ensure that the objectives and targets are measurable if possible, and that the progress towards achieving the objectives and targets is continually monitored and reviewed.

The achievement of objectives, targets and programmes shall be reviewed by the EMS Committee every 6 months and shall be discussed as part of every toolbox meeting. The EMR shall lead the EMS Committee in revising the objectives, targets and programmes as necessary.

Snappy Gum Heritage Services shall ensure that the programmes are amended as appropriate for new projects and new or modified activities, products or services in order to ensure that environmental management applies to such projects and activities.

In the event that objectives and targets in the programmes are not met, the EMR shall revise the programme as necessary and maintain documented evidence / records for the actions taken to mitigate the problems.

The EMR shall also maintain obsolete objectives, targets and programmes as an EMS record for three years.

### **4.3 Implementation and Operation**

The implementation of the EMS requires Snappy Gum Heritage Services to clearly define roles, responsibilities and authorities of key personnel, commit to staff training, maintain effective communication channels, adopt effective document and operational controls, and maintain sufficient awareness on emergency preparedness among the staff.

#### **4.3.1 Resources, Roles, Responsibility and Authority**

The Owner/Managing Director of Snappy Gum Heritage Services shall commit to provide resources (including human resources and specialized skills, organizational infrastructure, technological and financial resources) essential to the implementation and control of the EMS. The roles, responsibilities and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective environmental management.

Snappy Gum Heritage Services has appointed the Managing Director as the

Environmental Management Representative (EMR), and the Senior Archaeologists as the Deputy Environmental Management Representatives (DEMR) for the implementation and maintenance of the EMS. Their EMS responsibilities are described in section 3 of this manual.

#### **4.3.2 Competence, Training and Awareness**

Snappy Gum Heritage Services shall ensure all persons performing tasks for it or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience, and shall retain associated records and record their use in the Snappy Gum Employee Training Register (WHS-R-001 Snappy Gum Employee Training Competency Register).

Snappy Gum Heritage Services will need to ensure that all people performing tasks for or on behalf of the organization, which includes contractors, sub-contractors, temporary staff and remote workers, are informed about the presence of potential environmental risks within any relevant area prior to starting any work.

Snappy Gum Heritage Services shall establish, implement and maintain procedures to identify the training needs associated with its environmental aspects and its EMS, and develop programmes to ensure awareness and competence, at each relevant function and level, by addressing:

- the roles and responsibilities in achieving conformity with the environmental management system;
- the importance of conformity with the environmental policy, the procedures and the requirements of the structured EMS;
- the significant environmental aspects and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance;
- the potential consequences of departure from specified operating procedures.

#### **4.3.3 Communication**

For internal communication, the EMR shall ensure information regarding the EMS (such as the policy, objectives, targets and programmes) and environmental performance is readily available to employees. Given the small size of Snappy Gum Heritage at the time of writing, all such documents will be kept in a central location on the server and all employees will be emailed regarding any changes.

Employees with enquiries / complaints regarding to the EMS and/or environmental issues of Snappy Gum Heritage Services shall inform their Managing Director/EMR. The designated member of EMS Committee representing each division shall maintain a log for the relevant enquiries / complaints. Depending on the nature and scope of the enquiry / complaint, the EMR shall determine the corresponding action and maintain relevant records to demonstrate the response / corrective actions taken.

For external communication, the environmental policy will be made available at the office and [www.snappygumheritage.com.au](http://www.snappygumheritage.com.au). All internal and external enquiries / complaints / communications shall be discussed and reviewed during the EMS Committee meeting and the decision shall be recorded on meeting minutes.

#### **4.3.4 Documentation**

The Environmental Management System documentation encompasses four levels as described below:

The first level is the *Environmental Management System Manual* (this document) which includes Snappy Gum Heritage Services' environmental policy (specifying the principal objectives and environmental commitments of Snappy Gum Heritage Services), and a broad description of how Snappy Gum Heritage Services addresses the ISO 14001 requirements. The EMS Manual serves as an interface to interpret the relationship between Snappy Gum Heritage Services' EMS and the ISO 14001 Standard.

The second level is the *Environmental Procedures (EPs)*, which include all procedures that Snappy Gum Heritage Services shall follow as specified in the ISO 14001 Standard. These procedures provide a detailed description of the EMS elements and define who should do what, how and when.

The third level is the *Environmental Instructions (EIs)*, which are operational control procedures or instructions, with defined responsibilities, to control the identified significant environmental aspects associated with Snappy Gum Heritage Services' operations and activities.

The fourth level is *Environmental Records*, which arise from the implementation of the Environmental Management System Manual, Environmental Procedures and Environmental Instructions. Environmental Records include various checklists, reports and meeting records, etc, as defined in each Environmental Procedure and Environmental Instruction.

#### **4.3.5 Control of Documents**

The essences of EMS documentation controls are:

- they shall be reviewed, revised bi-annually and approved for adequacy by authorized personnel;
- that current version of relevant documents shall be available at all locations where operations essential to the effective functioning of the environmental management system are performed;
- that documents of external origin determined by the organization to be necessary for the planning and operation of the EMS are identified and their distribution controlled;
- obsolete documents shall be promptly removed from all points of issue and use, or are otherwise assured against unintended use; and
- any obsolete documents retained for legal and / or knowledge preservation purposes shall be suitably identified.

Snappy Gum Heritage Services shall ensure that documentation is legible, dated (with dates of revision) and readily identifiable, maintained in an orderly manner, and retained for a specified period. All EMS and related documents will be reviewed bi-annually to ensure accuracy.

#### **4.3.6 Operational Control**

Snappy Gum Heritage Services shall establish, implement and maintain operation control procedures to manage its significant environmental aspects.

Snappy Gum Heritage Services shall ensure that all operations and activities, carried out by Snappy Gum Heritage Services' employees or contractors, that are associated with the significant aspects are properly controlled, and that appropriate operational control procedures, in terms of Environmental Procedures (EPs) and Environmental Instructions (EIs), are communicated to personnel whose tasks may result in significant environmental aspects. Snappy Gum Heritage Services shall influence its staff by communicating its environmental policy and other relevant EPs and/or EIs to them.

Given the small size of Snappy Gum Heritage at the time of writing, all such documents will be kept in a central location on the server and all employees will be emailed regarding any changes. Furthermore, each change will be discussed in detail at the next Project Management Meeting.

#### **4.3.7 Emergency Preparedness and Response**

Snappy Gum Heritage Services shall establish, implement and maintain a procedure to identify potential emergency situations and responses to such situations, in order to prevent and/or mitigate environmental impacts that may associate with them.

As the workplace changes on a regular basis, the Emergency Preparedness will be discussed at the same time and manner as per the Workplace Health and Management System (see Section 19 of the WHMS). This will be re-assessed bi-annually.

#### **4.3.8 Monitoring and Measurement**

Snappy Gum Heritage Services' activities at any workplace will be subject to environmental monitoring and assessments on a bi-annual basis. Given the difficulties in accessing remote tenements, this review will be undertaken verbally and backed up with relevant documentation and be undertaken at the same time and manner as per the Workplace Health and Management System (see Section 20 of the WHMS).

#### **4.3.9 Evaluation of Compliance**

To meet the company's commitment to compliance, Snappy Gum Heritage Services shall regularly monitor and evaluate the compliance status of the applicable environmental legal requirements and other requirements that the company subscribes to. The records of the results of the periodic evaluations shall be retained. An internal systems audit will be carried out bi-annually and be undertaken at the same time and manner as per Audits of the Workplace Health and Management System (see Section 20.1 of the WHMS).

#### **4.3.10 Nonconformity, Corrective Action and Preventive Action**

Continual improvement of the EMS can be achieved by identifying nonconformity, correcting nonconformity and preventing nonconformity from occurring again. Regarding nonconformity and its subsequent corrective / preventive action, Snappy Gum Heritage Services shall handle any related incidents using the procedures and documentation identified in Section 19.4 and 19.5 of the Workplace Health and Management System. The role of this will be to:

- handle and investigate nonconformity;

- take action to mitigate the impacts caused;
- initiate and complete corrective and preventive actions;
- ensure that the corrective or preventive actions taken to eliminate the causes of actual and potential nonconformity are appropriate to the magnitude of problems and commensurate with the environmental impacts encountered;
- record the results of corrective and prevention actions taken;
- review the effectiveness of corrective action and preventive action taken;
- implement and record any changes in the documented procedures resulting from corrective and preventive action; and

Snappy Gum Heritage Services shall also ensure that any necessary changes are made to environmental management documentation.

#### **4.3.11 Control of Records**

Snappy Gum Heritage Services shall ensure that all environmental records and documents are kept in a secure location along with similar Workplace Health and Safety records.

Those documents that are to be made available to staff will be kept on the server, in a folder demarcated as 'Environmental Management System'. All related registers, Eps and EIs will be incorporated within.

Those documents related to incidents will be kept in a secure location and will be accessible only to the Managing Director and other selected parties where appropriate. No hard copies will be required. These documents will be kept for up to five years.

#### **4.3.12 Internal Audit**

Snappy Gum Heritage Services shall plan, establish, implement and maintain a programme and procedures to carry out bi-annual environmental management system audits to:

- a) determine whether or not the environmental management system:
  - conforms to planned arrangements for environmental management including the requirements of ISO 14001; and
  - has been properly implemented and maintained.
- b) provide audit results and information for management review for environmental improvement.

**This Audit will be undertaken annually by external safety consultants as organised by the Managing Director with the full participation of Snappy Gum employees.**

The audit programme, including the schedule, shall be based on the environmental importance of the activities concerned and results from previous audits. The audit procedures cover the audit criteria, scope, frequency and methods, as well as responsibilities and requirements for conducting audits and reporting results and retaining associated records.

Snappy Gum Heritage Services shall conduct EMS audits on an annual basis. Timely site environmental audits are required to ensure appropriate preventive



actions being taken as planned, and corrective actions being carried out within three months.

#### **4.4 Management Review**

The “plan-do-check-act” cycle shall require the top management of Snappy Gum Heritage Services to act and review the safety and environmental management system annually to ensure its suitability, adequacy and effectiveness.

**This review will be undertaken annually at the direction of external safety consultants as organised by the Managing Director with the full participation of Snappy Gum employees.**

Before the Review, the EMR shall schedule for the management review and inform all the participants, and gather all relevant records/requirements (such as change in legal requirements) and prepare a summary report (if necessary) for discussion. This will be undertaken with the participation/consultation of external safety advisors.

The Owner/Managing Director, EMR and Senior team members together with the EMS Committee shall take part in the annual management review. They shall assess the work done in the past year in environmental management and evaluate the existing EMS with respect to changes in legislation, concerns of interested parties, the wider heritage community, technology and product requirements, and lessons gained from previous experience, etc.

Topics to be discussed in the management review shall include but not be limited to:

- review of the environmental policy, objectives, targets, and programmes;
- review of legal compliance and compliance with other requirements (including contractor compliance on Snappy Gum Heritage Services’ activities);
- environmental aspects of activities and their disclosure to public;
- findings of the internal audits;
- review of nonconformities and the status of corrective/preventive actions;
- communications from external interested parties, including complaints;
- areas for improvement with respect to environmental performance;
- adequacy of emergency preparedness and response;
- changing circumstances, including developments in legal and other requirements related to its environmental aspects,
- identify the need for modification of the existing EMS in light of the above items, and
- follow-up action from previous management reviews.

The review shall initiate a new “plan-do-check-act” cycle with improvements in Snappy Gum Heritage Services’ environmental performance and further enhancement of the EMS.

Findings from the management review shall be recorded in the meeting minutes and the EMR shall retain it as an EMS record.